

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

COMPELLED RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-1 (b), 2, 3, AND 8
(July 13, 2001)

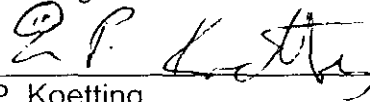
Pursuant to Presiding Officer's Ruling No. C2001-1/4 (July 6, 2001), the Postal Service files its compelled response to the above items. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 13, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-1[a] Confirm that Exhibit 125.22 of the Postal Operations Manual [POM] - Issue 8 dated July 18, 1998 and Exhibit 1.5 of Section G011.1.5 of the Domestic Mail Manual [DMM] - Issue 56 dated January 7, 2001 are both utilized to provide Holiday Service Levels to members of the public as well as postal employees. [b] Confirm that the Definition of Terms for Holiday and Sunday contained in the DMM Exhibit also apply to the POM Exhibit. [c] Confirm that the approving authority for exceptions to the service levels differs between the POM and DMM Exhibits. [d] Provide any other differences that exist between the POM and DMM Exhibits and advise which Exhibit is correct. [e] Please explain and discuss any items that you are not able to confirm.

RESPONSE:

b. While there is no reason to believe that the intent of the two exhibits is any different, the terms "Holiday" and "Sunday" defined in the DMM exhibit don't literally appear in the POM, where the references instead are to "Holiday Schedule" and "Sunday Schedule." Presumably, those terms as used in the POM mean the same things as the terms used and defined in the DMM.

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DBP/USPS-2. For the period of 1987 to date, please provide a complete listing of any exceptions to the holiday service levels that were approved by a District Manager as noted in the Note following Section B of Exhibit 1.5 in the DMM.

RESPONSE:

This item, and DBP/USPS-3, are being answered using the optional approach described in P.O. Ruling No. C2001-1/4 (July 6, 2001) at 4. Both the POM and DMM exhibits include a note that exceptions to the indicated holiday service levels must be approved by higher-level authorities. The purpose of those notes is to put readers on notice of the possibility of exceptions to the service levels indicated, and to put local post offices on notice that they should not unilaterally be deviating from the indicated service levels. In both of these senses, the notes are still "current."

The sense in which these notes are probably not "current," which appears to be the sense contemplated in these questions, is the sense in which local offices are envisioned to contemplate an exception, propose that exception in writing to higher authorities, and the higher authorities formally "approve" or "disapprove" the proposed exception. Under this type of scenario, there presumably would exist (or at least, at some time, would have existed) a written record of the "exceptions" upon which these questions seem to be quite firmly focused. If such procedures ever were the predominant means by which exceptions were authorized, however, they no longer are, and they have been supplanted by the procedures described below.

The current practice is that already extensively documented in the information supplied in this proceeding by the Postal Service. The materials included in LR-1 and LR-3 suggest that although this practice in its current form emerged most recently in

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1998, roughly similar practices appear to have been employed going back at least as far as the mid-1990s. Rather than starting at the bottom (i.e., the local office), the current procedure is to start at the top (i.e., Headquarters) for each holiday with a holiday memo. While that memo may not actually be signed by the Chief Operating Officer (the higher-level official specified in the POM note), it is obviously approved by those senior management officials to whom the COO has delegated that authority. In some instances, the holiday memo will set forth holiday service equivalent to that which is set forth in the POM and DMM exhibits.

One critical distinction between the holiday memos and those exhibits, however, is the fact that the holiday memos specifically address holiday mail processing, and the exhibits do not. Because of a need to coordinate those functions, the holiday memo approach is much more practical. Collection on holidays could conform exactly with the collection guidelines in the POM and DMM exhibits, without any exceptions, but if the holiday mail collected is not processed, it would be unclear how mailers would have benefitted from maintaining those levels of collections.

The holiday memos go from the top down. Area officials may get involved in determination of the practices by which the instructions in the memos are implemented, or that responsibility may be delegated down the line. In any event, individual offices are not likely to make any decisions without the involvement of the district managers (the higher-level officials specified in the DMM note) or their designees. One scenario likely to be common, at least in circumstances in which there otherwise might be ambiguity, is discussion between individual offices and District or Area officials in which

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mutually acceptable ways to implement the holiday memo are reached. In terms of moving mail on the holiday (i.e., collection, mail processing, and transportation), the network nature of postal operations virtually requires this type of consultation to be employed in the exercise of any discretion which depends upon or could affect downstream operations.

Overall, the procedures currently employed may not be those anticipated by persons who envision a "list" of authorized exceptions, but the results are broadly consistent with those contemplated by the notes in the DMM and POM exhibits. The opportunity for exceptions will generally not be available without the implicit authorization of the COO as provided by the holiday memo issued by Headquarters. In instances in which the holiday memo leaves discretion to lower-level decisionmakers, the determination of actual holiday service levels will generally be done with the explicit involvement of District officials, or higher.

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DBP/USPS-3. For the period of 1987 to date, please provide a complete listing of any exceptions to the holiday service levels that were approved by the Chief Operating Officer and Executive Vice President as noted in the Note following Section B of Exhibit 125.22 in the POM.

RESPONSE:

Please see the response to DBP/USPS-2.

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DBP/USPS-8[a] Please confirm that it is the policy of the Postal Service to eliminate or reduce retail window service on days shortly before or after a holiday as compared to a similar day of the week not related to the holiday period. [b] Please provide all documents [for the period from 1987 to date] stating Postal Service policy, guidance, or recommendations for deciding, or establishing criteria for deciding, the elimination or reduction of retail window service on days shortly before or after a holiday. [c] Please advise the publicity provided to the mailing public to advise them of the elimination or reduction of retail window service. [d] Please explain and discuss any items that you are not able to confirm.

RESPONSE:

a. There is no such "policy." In fact, the Postal Service is much more likely to extend window hours in the days and weeks before Christmas.

b. In the three years prior to filing of the complaint, the Postal Service is unaware of any national level documents other than those already provided in LR-1. An examination of those documents reveals no instances during that period in which retail service is authorized to be curtailed on any days either before or after holidays.

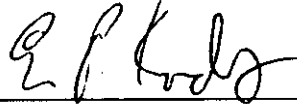
c. Not applicable. See the response to part b.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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